

KEITH M. KIUCHI #2735  
1001 Bishop Street, Suite 985  
Honolulu, Hawaii 96813  
Telephone: (808) 533-2230  
Facsimile: (808) 533-4391  
E-Mail: [kkuchi106@cs.com](mailto:kkuchi106@cs.com)

Attorneys for Defendant MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC

CHOI & ITO, Attorneys at Law  
Chuck C. Choi #6435  
Allison A. Ito #8152  
Michel A. Okazaki #6524  
(independent lawyer appearing through Choi & Ito)  
700 Bishop Street, Suite 1107  
Honolulu, Hawaii 96813  
Telephone: (808) 533-1877  
Facsimile: (808) 566-6900  
Email: [cchoi@hibklaw.com](mailto:cchoi@hibklaw.com)  
[aito@hibklaw.com](mailto:aito@hibklaw.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

MARTIN DEFENSE GROUP, LLC,  
AND NAVATEK HOLDINGS LLC

Plaintiffs,

v.

MARTIN KAO; TIFFANY JENNIFER LAM a.k.a. JENNY LAM and/or TIFFANY KAO; LAWRENCE KAHELE LUM KEE; CLIFFORD CHEN; GARY AMBROSE; DUKE HARTMAN; SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS LLC,

Defendants.

Case 1:22-cv-00283-LEK-WRP

DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC'S FRCP RULE 7.1 DISCLOSURE STATEMENT

**DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY  
LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN  
SCIENTISTS AND ENGINEERS, LLC'S FRCP RULE 7.1 DISCLOSURE  
STATEMENT**

Pursuant to FRCP Rule 7.1, DEFENDANTS MARTIN KAO, TIFFANY JENNIFER LAM aka JENNY LAM and/or TIFFANY KAO, AND SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC make the following disclosures: SOCIETY OF YOUNG WOMEN SCIENTISTS AND ENGINEERS, LLC, is not a corporation and does not have a parent corporation and is not owned in whole or in party by any corporation.

DATED: Honolulu, Hawaii, August 29, 2022.

/s/ Chuck C. Choi  
KEITH M. KIUCHI  
CHUCK C. CHOI  
ALLISON A. ITO  
MICHEL A. OKAZAKI  
ATTORNEYS FOR DEFENDANTS  
MARTIN KAO, TIFFANY LAM AND  
SOCIETY OF YOUNG WOMEN SCIENTISTS  
AND ENGINEERS